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*Attorneys for Plaintiff Eric Schiermeyer*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH**

ERIC SCHIERMEYER, Derivatively on  
Behalf of Nominal Defendant, BLOCKCHAIN  
GAME PARTNERS, INC. D/B/A GALA  
GAMES,

Plaintiff,

vs.

WRIGHT THURSTON and TRUE NORTH  
UNITED INVESTMENTS, LLC,

Defendants,

BLOCKCHAIN GAME PARTNERS, INC.  
D/B/A GALA GAMES,

Nominal Defendant.

**RESPONSE TO MOTION TO  
CONSOLIDATE**

Case No. 2:23-cv-00589-HCN-DAO

Judge Howard C. Nielson

Magistrate Judge Daphne A. Oberg

Plaintiff Eric Schiermeyer, derivatively and on behalf of Nominal Defendant Blockchain Game Partners, Inc. (“Gala Games” or the “Company”), in response to the Motion to Consolidate (“Motion”) filed by Defendants Wright W. Thurston and True North United Investments, LLC [Dkt. 50], states as follows:

1. On Wednesday, October 11, 2023, counsel for Thurston sent an email asking if Schiermeyer would stipulate to consolidating the two lawsuits filed by the parties. Schiermeyer's counsel responded that he would convey Schiermeyer's position by that Friday (e.g. within two days). On Thursday, October 12, 2023, Thurston filed the instant motion.

3. On Friday, October 13, 2023, counsel for Schiermeyer sent a letter suggesting that, rather than consolidating these cases, Thurston should file a counterclaim in this action, amending his claims to remove certain unfounded allegations.

4. Thurston has not responded to the October 13th letter. Thus, it appears that Thurston still hopes to consolidate the actions, rather than file amended claims in this action.

5. Although Shiermeyer contends that Thurston's approach is inadvisable, he does not oppose the consolidation of the two cases.

DATED this 26<sup>th</sup> day of October, 2023.

SNELL & WILMER L.L.P.

/s/ Paul W. Shakespear

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